

Oklahoma WIOA State Plan for Program Year 2020-2023

Public Comments

Comment: On page 151 of the Plan in Youth Program Requirements, it seems the simple one-line response doesn't fully answer the Department of Labor's requirement. As I interpret the planning requirement, DOL is asking the state to include additional information about how the definition of "basic skills deficient" will be implemented in practice. Part (A) of the definition relies on a generally accepted standardized test to assess the skill level of the individual. Part (B) of the definition doesn't require a generally accepted standardized test, but it does imply that there will be another type of assessment or evaluation used to determine whether the individual has a literacy level that is necessary to function on the job, in the family of the individual, or in society. The assessment or evaluation for Part (B) could be based on a teacher's informal observation of an individual's reading, writing, speaking, listening, and/or math skills. It could be based on a simple survey or inventory of skills. It would be a determination that is valid – yet less rigorous than a "generally accepted standardized test." I think it would be helpful for the State Plan to include a State definition that provides an alternative to the *generally accepted standardized test* requirement. For the simple purpose of determining individual eligibility, it should not be necessary to administer the TABE or a similar standardized test. A more flexible approach would be to rely on the professional opinion of a literacy teacher or workforce counselor. The definition might be broad enough to accept a determination made by an employer who has had a chance to observe the individual's abilities in a real –life working environment. In any case, it seems that the state's response needs to be more than a single sentence. In particular, it needs to include a statement that clarifies the state's position with regard to part (B) of the definition of Basic Skills Deficient. It needs to provide an answer to this: If not using the portion of the definition contained in WIOA Section 3(5)(B), indicate that is the case. To summarize, I hope you will consider flexible alternatives for evaluating basic literacy and numeracy skills, etc. Creativity is encouraged.

Response: Additional detail was added on pages 151 and 152.

Comment: On page 75 about "Partnerships with the Oklahoma Department of Commerce," it seems to me that this would be a good place to mention the leading role that Commerce plays in the administration of Community Services Block Grants. A reference to the state's CSBG Plan as an important aspect of the department's economic development mission would seem to fit nicely on page 75.

Response: Relevant language from the state's Community Services Block Grants (CSBG) plan was added to pages 75 and 76 showing how CSBG collaborate with WIOA programs.

Comment: Migrant Seasonal farm workers Agricultural Outreach committed in Feb. 2016. Is there a group? When do they meet? Who are the three outreach workers? How are they utilized? Claiming coordination with workforce boards but not seeing proof.

Response: The OKAG is still in existence and they met quarterly. In 2019 the group took off to re-define their aim/purpose and focus and is to reconvene in 2020. There are three Outreach Workers whose area of coverage divides the state in three sections: West Oklahoma; Central Oklahoma and East Oklahoma. They are utilized in accordance to 20 CFR.653.107 (b)(11). Area Managers meet with and attend Workforce Board meetings and contribute to agenda items when called upon. The desk aid is an internal document apart of guidance and procedure for Workforce Center and Outreach staff. It can be made available upon request.

Comment: Are the KENs coming back to life? Reference to them was located in one section.

Response: KENs will not be utilized. Language referencing the KENs has been removed.

Comment: Reading through the plan, there is no mention of how resources are allocated throughout the state aside from the formula distribution. How is everything allocated?

Response: Resource allocation was addressed in the plan when asked for and required.

Comment: The plan says the State implemented a new Case Management System. What is the new system? The existing system has been in place for two years now. Maybe new language should be added to explain this further.

Response: The word 'new' has been removed.

Comment: Can we get page numbers on the state plan?

Response: Page numbers have been added.

Comment: It is apparent the unified plan was not coordinated by the partners but written by different organizations. In future plans, it is suggested that Oklahoma consider a Combined State Plan so we can highlight more of our collaborations and better see gaps.

Response: Noted.

Comment: Leadership from each WIOA Core Partner program selected individuals to participate on a State Plan Committee. Those individuals met to jointly develop individual program components and joint components of the plan (page 5). LWDB are not aware of Title 1 WIOA local representation included in the State Plan Committee, as indicated in the above statement.

Response: This statement does not indicate local representation was included. Leadership from each WIOA Core Partner Program included high-level representatives from core partner agencies including the Oklahoma Employment Security Commission, the Oklahoma Department of Career and Technology Education, the Oklahoma Department of Rehabilitation Services, and the Oklahoma Office of Workforce Development.

Comment: In the previous plan complimentary sectors were outlined, which expands demand occupations. Local areas would like to see complimentary sectors included. Entrepreneurial was removed, local areas would like to recommend including entrepreneurial opportunities.

Response: The Oklahoma Department of Commerce (ODOC) revisited the five ecosystems (economic systems) that drive wealth in Oklahoma that were originally identified in 2015. The in-depth analysis resulted in the same 5 ecosystems for the state, which were adopted for the State Plan to ensure alignment between economic development priorities and workforce development priorities. For simplicity, Ecosystems are referred to as Industry Clusters. Ecosystems and Industry Clusters can be used interchangeably. The ODOC also analyzed the 2015 complementary ecosystems. Complementary ecosystems (Industry Clusters) help expand wealth in the economy, but are not generally export-based. The 2015 Complementary ecosystems did not account for regional difference across the planning regions. To address regional needs, ODOC conducted a rigorous analysis (described below). They identified the top industry clusters in each region which represent the state's economic development priorities. These regional industry clusters may be used by local workforce boards to identify additional demand occupations in priority sectors if they choose.

Comment: The plan proposes “Industrial” and STEM under industry clusters and eliminates advanced manufacturing and leaves a broad stroke for “STEM” industry clusters. Please consider including advanced manufacturing in industries and consider elimination of STEM as a general statement when referring industry clusters.

Response: The Oklahoma Department of Commerce (ODOC) determined naming and grouping of industry clusters. In this case, ODOC uses the term industrial as an umbrella term to represent manufacturing. This is a high-level term and more specific industries (NAICS) and Occupations (SOC) with more specific terminologies fall under the broad term of Industrial (food processing and advanced manufacturing are included). STEM is an industry cluster. Industry clusters (ecosystems) are comprised of industries (NAICS) and occupations (SOC) under the umbrella term. The rigorous analysis that ODOC completed found STEM as a state economic driver.

Comment: Can you provide a brief explanation of changes made to the Ecosystems and why those changes were made?

Response: The methodology used by the Oklahoma Department of Commerce (ODOC) for industry clusters: The source data to start the process was establishment level data from over 100,000 business establishments in the state. Major employers are non-retail sector establishments that are among the top twenty percent of employing establishments in their respective counties. Major employers include traditional sectors targeted in economic development including manufacturing, energy and knowledge-based service industries. It also includes other sectors that are not targeted in economic development but are important to the local region and have demands on workforce skills. These sectors include agriculture, construction, utilities, healthcare, education, government, tourism and hospitality industries to name a few. Every county is factored into this analysis, but for reporting purposes, counties are grouped into the Workforce Investment Board regions. After identifying the top twenty percent of the major employers in each of the counties, they were grouped into industry clusters in their regional economy. The clusters were informed by the methodology utilized by the Harvard Business School and the Economic Development Administration. However, in order to report some of the data in a meaningful manner for our local partners, there was some customization grouping linked industries. Establishment level data from the Quarterly Census of Employment & Wages was utilized as the primary data source in the cluster identification.

Comment: The state is developing Centers of Workforce Excellence that will be a designation for which postsecondary institutions can apply indicating they meet the criteria for excellence in workforce development training. Is this correct, only postsecondary institutions can apply?

Response: Centers of Workforce Excellence can be postsecondary institutions, businesses or other groups who address the five topics: Education & Innovation; Partnerships & Advisory Board; Evidence of Planning and Progress; Evidence of Promotion and Recognition; and Evidence of Sustainability. Language has been added to page 41 to reflect this correction.

Comment: Oklahoma Works System Threats: Lack of support from local workforce board and system partners; Difficulty getting business and industry actively engaged. No issues identified locally with business or industry engagement and not viewed as a threat. Is it possible to include those who participated in the SWOT analysis?

Response: Core partners from the Oklahoma Employment Security Commission, Oklahoma Department of Rehabilitation Services, Oklahoma Department of Career and Technology Education, and the Oklahoma Office of Workforce Development were asked for input.

Question: The System Oversight Subcommittee (SOS) includes and seeks input on policy and guidance from the Workforce Development Boards and staff as necessary. How is Title 1 represented and why are partners creating policy for Title 1 without Title 1 representation and why isn't it reciprocal?

Response: Title 1 staff of the Oklahoma Office of Workforce Development actively participate as members of the SOS alongside state level staff of other core partner agencies. All policies and guidance created through the SOS includes input from Title 1 as well as from Titles 2, 3, and 4 as appropriate.

Comment: Why has the projected job gap changed so much on the graph on page 40 (47%-33%)?

Response: The change is based upon the demand for the level education in the new jobs for 2024. The forecast aligns with the need, and that can increase the demand. The new version of the skill gap shows those without a High School diploma, to underline that need for a High School education for those without it. It also combines High School with those without High School education, and certificates or On the Job training to give a more robust example of each particular education level. The change was also made because of a few errors that were found in the education estimation process, which lead to double counting among those with High School or Less than High School with a certificate or on the job training, the new version adjusts for this and gives a more reliable estimate of the population's education supply and demand.

Comment: For example, Local Elected Official Consortium Agreements identify collective responsibilities of the LEOs with regard to services provided, funding costs, methods for referring individuals among services, procedures to ensure customers with barriers to employment have access to services, and ensuring the system is meeting the needs of business. The LEO Agreement addresses the Workforce Development Area, Roles and Responsibilities, designates a FA and a CLEO, etc. not the list referenced in this section, correct?

Response: This section refers to the Roles and Responsibilities outlined in the Local Elected Official Consortium Agreements which include budget approval, collaboration in the preparation and submission of a regional and local plan, and develop and enter into a MOU (Memorandum of Understanding) concerning the operations of the one-stop delivery system. These operational activities align with and support the strategic activities listed in the state plan response.

Comment: A greater focus and clearer strategies for out-of-school youth (14-18 years) with regard to credential attainment, work experience, and work-based learning; And, a fully deployed Individual Career and Academic Plan (ICAP) integrated with all students within the secondary school system as a preventative measure. WIOA clearly outlines the strategies for OSY – could this statement be clarified? The ages indicated above (14-18) are not necessarily Out of School Youth.

Response: The age range for this population (14-18) was removed.

Comment: Please consider an ISY/OSY waiver that would allow locals to support ICAP and OEIP initiatives for the ISY at-risk populations.

Response: Requests for waivers may be made utilizing the process outlined in OWDI 05-2018 Change 1.

Question: OOWD staff are developing collaborative partnerships with the Oklahoma Department of Rehabilitative Services, the State Department of Veterans Affairs, the Oklahoma State Regents for Higher Education, Tribal Career Services, the Oklahoma Department of Career and Technical Education, and non-profit organizations to develop Registered Apprenticeship Programs targeted to non-traditional and underserved populations. Plans to partner with core partners are outlined in detail, but no mention of planned partnerships with local areas. How can local areas be incorporated into the initiatives?

Response: Language has been added on page 53 describing how OOWD is continuing to develop processes and partnerships with local areas.

Comment: The subcommittee works through a task force model to include the input of subject matter experts and local area perspectives. Local areas are grateful for inclusion in these subcommittees.

Response: Noted.

Comment: Oklahoma has strong partnerships among state agencies, education institutions (PK-12, career and technical education, 2- and 4- year institutions), economic development organizations, and community-based organizations, both at the State level and at the local level with our Workforce Development Boards. The plan mentions the strong partnership between state agencies and educational institutions however, the relationships are yet to yield any demonstrated progress between any of the entities.

Response: Noted.

Comment: The Workforce System Oversight Committee (WSOC) makes decisions on program governance, policy and capacity building for the Local Workforce Development Boards and partnerships. The Committee serves as an oversight board and ensures compliance with WIOA. Workforce System Oversight Committee is referenced as creating the standards for specific outcomes for the system (implies all core partners) yet the committee only approves policy for Title I.

Response: When joint policies are developed for the system, WSOC reviews and approves those policies.

Comment: The Career Pathways Committee makes recommendations, informs, coordinates and facilitates statewide efforts to improve Oklahomans' exposure to high-demand career and entrepreneurship opportunities, along with the education and training required for entry into and advancement within a chosen career. The Committee develops industry sector strategies in state and regional ecosystems to ensure that the education and training system is delivering the skills needed by employers. The Committee has the following objectives: Make Career Pathways part of the Board certification process. Per OWDI 05-2017 Change 1- by definition, board certification means LWDB membership meets required conditions for membership, nominations and board composition. The certification process of LWDB is to ensure required board structure is met.

Response: This is a typo that should have said Center certification process. Language has been corrected.

Comment: "Oklahoma has made a concentrated effort to work in conjunction with local areas to encourage them to seek re-designation and look at ways to streamline administrative costs." The state has addressed these re-designations issues and streamlined administrative costs. However, existing mergers encouraged by the state have been counterproductive and have created hardships for some local areas.

Response: Noted.

Question: A member of the GCWED is the leader of the System Oversight Subcommittee. System partners include: the Oklahoma Department of Career and Technology Education—Adult Basic Education, the Department of Rehabilitation Services - Vocational Rehabilitation, the Department of Human Services, the Oklahoma Employment Security Commission--Wagner-Peyser, the State Regents for Higher Education, and Title I programs representing Adults, Dislocated Workers and Youth. Can you

identify the Title 1 representation on the SOS subcommittee? Title I SME and/or local boards are not represented on the SOS that primarily only address/writes policies that only effect Title 1.

Response: OOWD staff actively participate as representatives of Title 1 on the SOS. Local boards are consulted as needed and appropriate to provide input on policies that impact their work. The SOS works to develop policy and guidance for system issues that require coordination across core partner programs, not just Title 1.

Comment: Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services (e.g. transportation), to individuals, including those populations identified in section II(a)(1)(B), and individuals in remote areas. The activities described shall conform to the statutory requirements of each program. How can the plan speak of coordination of services when there is no plan to co-locate programs for the convenience of the customer?

Response: When possible services are co-located. In some instances, services cannot be co-located due to extenuating circumstances, such as Department of Rehabilitation Services being unable to locate services in a facility that is not accessible. The Oklahoma Department of Rehabilitation Services is a longstanding and active partner in the Workforce System to improve services for consumers with disabilities and employers of Oklahoma. When the American Job Centers are certified as being ADA compliant and have space available, OKDRS dedicates one co-located staff member and/or provides direct linkage in the comprehensive American Job Centers in Oklahoma. OKDRS staff assists in serving customers with disabilities through the one-stop delivery system and further demonstrates commitment to support the American Job Centers efforts to coordinate and align services.

Comment: Oklahoma Works offices are listed as Employment Service Offices. Can we make the brand consistent throughout the document?

Response: 'Employment Service Office' language on page 69 has been changed to 'Oklahoma Works Centers'.

Question: OOWD staff are developing collaborative partnerships with the Oklahoma Department of Rehabilitative Services, the State Department of Veterans Affairs, the Oklahoma State Regents for Higher Education, Tribal Career Services, the Oklahoma Department of Career and Technical Education, and non-profit organizations to develop Registered Apprenticeship Programs targeted to non-traditional and underserved populations. Would OOWD considering adding collaborative partnerships with LWDBs to target non-traditional and underserved populations?

Response: Language was added to page 74 describing how OOWD is continuing to develop processes and partnerships with local areas to target non-traditional and underserved populations.

Question: At the present time, the committee is collaborating in writing and identifying policies and processes that will continue to build and improve the workforce development system in wake of the WIOA implementation, as well as contribute to Oklahoma's overall economic well-being. They meet on a regular basis and identify program specific barriers and create solutions to move forward. Most of the local areas are in the process of building partnerships to accomplish their version of the utopian system and require guidance from this team; discovering they feel very comfortable requesting assistance from their peers representing their agency. Local areas have built robust relationships within their communities and are connected with the needs of local areas and regions. SOS does not have a history of providing TA to locals regarding partnerships. Is the expectation that the SOS committee provided TA to local areas and could this statement be clarified?

Response: As a subcommittee of the Workforce System Oversight Committee of the Governor’s Council for Workforce and Economic Development, the System Oversight Subcommittee (SOS) is comprised of state level partner representatives to collaborate on the development of policies and initiatives to improve the workforce system statewide. SOS members represent their organizations across the local workforce development areas and are best positioned to be a resource to their staff to support the work for local areas in reinforcing their relationships.